

Schuyler G. Carroll  
Jeffrey D. Vanacore  
PERKINS COIE LLP  
30 Rockefeller Center, 25th Floor  
New York, NY 10112-0085  
212.262.6900  
212.977.1649 (facsimile)  
[scarroll@perkinscoie.com](mailto:scarroll@perkinscoie.com)  
[jvanacore@perkinscoie.com](mailto:jvanacore@perkinscoie.com)

David M. Miller (*Pro Hac Vice Motion Pending*)  
303 E. 17th Avenue, Suite 500  
Denver, CO 80203  
303.832.2400  
303.832.1510 (facsimile)  
[dmm@kutnerlaw.com](mailto:dmm@kutnerlaw.com)

Attorneys for Movants

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re:	:	
	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC.;	:	
LB ROSE RANCH LLC and PAMI STATLER	:	Case No. 08-13555 (JMP)
ARMS LLC,	:	(Jointly Administered)
	:	
Debtors.	:	
	:	
-----	X	

**ORDER GRANTING RULE 2004 MOTION**

Upon the motion by the Movants,<sup>1</sup> by and through their attorneys Perkins Coie LLP and Kutner Miller Brinen, P.C. for the entry of an order authorizing examination of Debtors pursuant to Bankruptcy Rule 2004; and it appearing that due and sufficient cause exists therefore, it is hereby

ORDERED, the Motion is granted in its entirety; and it is further

---

<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

ORDERED, that the Debtors shall produce, by no later than April 29, 2011, the following insurance policies related to the Ironbridge Development and adjacent golf course:

(a) All general liability and excess insurance policies of the Debtors for the period 2000 through the present, including information and documents relating to the limits of each policy; and it is further

ORDERED, that the Debtors shall provide written responses to the following questions related to the Ironbridge Development and adjacent golf course:

(b) Debtors' per occurrence and aggregate limits for Products Completed Operations Hazards coverage for the period 2000 through the present;

(c) The gross applicable deductible for each policy;

(d) The self-insured retention ("SIR") for each policy year;

(e) Whether any policy has "soils movement" exclusions;

(f) Whether any policy has "anti-stacking" provisions; and

(g) Whether any policy contains exclusions relating to maintenance by the Debtors of the golf course at the Ironbridge Development.

Dated: New York, New York.  
April \_\_, 2011

---

UNITED STATES BANKRUPTCY JUDGE